

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

KATHERINE REYNOLDS,

Plaintiff,

v.

Case No. 3:09cv238

RELIABLE TRANSMISSIONS, INC.

And

GE CAPITAL FINANCE, INC.

Defendants.

MOTION TO WITHDRAW

John A. Gibney, Robert R. Musick, and the law firm of ThompsonMcMullan, P.C. (hereinafter "ThompsonMcMullan"), counsel for Defendant Reliable Transmissions, Inc., move this Court pursuant to Local Rule of Civil Procedure 83.1(G) for leave to withdraw as counsel, and in support of this motion state as follows:

1. Reliable Transmissions, Inc. engaged ThompsonMcMullan to defend its interests in this lawsuit on or about May 14, 2009.
2. Reliable Transmissions, Inc. is not paying ThompsonMcMullan as agreed.
3. Reliable Transmissions, Inc. is also not responding to communications from counsel.
4. This Court has not yet set this matter for trial, and no discovery has been conducted.
5. Reliable Transmissions, Inc. will not be prejudiced by ThompsonMcMullan's withdrawal as counsel.
6. It will cause a hardship on ThompsonMcMullan if it is required to represent Reliable Transmissions in this matter.

WHEREFORE, John A. Gibney, Robert R. Musick, and the law firm of ThompsonMcMullan, P.C. respectfully request that this Court permit them to withdraw as counsel for Reliable Transmissions, Inc.

/s/ Robert R. Musick
John A. Gibney, VSB No. 15754
Robert R. Musick, VSB No. 48601
ThompsonMcMullan, P.C.
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Counsel for Reliable Transmissions, Inc.

CERTIFICATE OF SERVICE

I certify that on this 26th day of August 2009, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Leonard A. Bennett
Robin A. Abbott
Gary L. Abbott
Consumer Litigation Associates, P.C.
12515 Warwick Boulevard, Suite 100
Newport News, VA 23606
Counsel for Plaintiff

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Attorneys for GE Capital Financial, Inc.

I further certify that a copy of the foregoing motion was mailed by first class mail, postage prepaid, to:

Reliable Transmissions, Inc.
13669 Warwick Boulevard
Newport News, Virginia 23602

/s/ Robert R. Musick
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